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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
APPROXIMATELY \$9,960.00 IN  
U.S. CURRENCY,  
  
Defendant.

2:20-MC-00073-TLN-CKD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Tunisha Vance (“claimant”), by and through their respective counsel, as follows:

1. On or about January 10, 2020, claimant filed a claim in the administrative forfeiture proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,960.00 in U.S. Currency (hereafter “defendant currency”), which was seized on October 26, 2019.

2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
2 parties. That deadline was April 9, 2020.

3 4. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 8,  
4 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
6 forfeiture.

7 5. By Stipulation and Order filed July 1, 2020, the parties stipulated to extend to September  
8 7, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
10 forfeiture.

11 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
12 to November 6, 2020, the time in which the United States is required to file a civil complaint for  
13 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
14 currency is subject to forfeiture.

15 7. Accordingly, the parties agree that the deadline by which the United States shall be  
16 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
17 alleging that the defendant currency is subject to forfeiture shall be extended to November 6, 2020.

18 Dated: 9/2/2020

McGREGOR W. SCOTT  
United States Attorney

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20 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

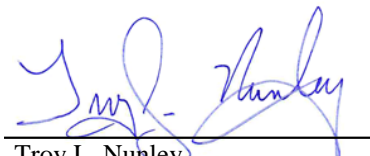
21  
22 Dated: 9/2/2020

/s/ Jacek W. Lentz  
JACEK W. LENTZ  
Attorney for potential claimant  
Tunisha Vance

(Signature authorized by email)

23  
24  
25  
26 **IT IS SO ORDERED.**

27 Dated: September 2, 2020

  
Troy L. Nunley  
United States District Judge